

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

In the Matter of:

Melanie A. Sharpe

Debtor(s)

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Case No. 19-27035

Chapter 13

Judge Jacqueline P. Cox

NOTICE OF MOTION

TO:

Thomas H. Hooper, Chapter 13 Trustee, 55 E. Monroe St., Suite 3850, Chicago, IL 60603, via electronic court notification;

Cenlar FSB, 425 Phillips Blvd., Ewing, NJ 08618, via U.S. Mail;

Peter C. Bastianen, Attorneys for Cenlar FSB, Codilis and Associates, 15W030 N. Frontage Rd., Suite 100, Burr Ridge, IL 60527, via U.S. Mail;

Capital One Auto Finance, Attn: Bankruptcy, PO Box 30285, Salt Lake City, UT 84130, via U.S. Mail;

Chase Home Mortgage, Mail Code LA4 5555 700 Kansas Ln, Monroe, LA 71203, via U.S. Mail;

Cook County Treasurer's Office, 118 N. Clark St., #112, Chicago, IL 60602, via U.S. Mail;

Circuit Court of Cook County, 50 W. Washington, Chicago, IL 60602, via U.S. Mail;

Liberman Management Services, 25 Northwest Point, Suite 330, Elk Grove Village, IL 60007, via U.S. Mail;

Select Portfolio Servicing, PO Box 65250, Salt Lake City, UT 84165; via U.S. Mail;

Wells Fargo Home Mortgage, PO Box 10335, Des Moines, IA 50306, via U.S. Mail;

Melanie A. Sharpe, 16721 Luella Ave, South Holland, IL 60473; via U.S. mail;

SEE ATTACHED ADDRESSES

PLEASE TAKE NOTICE that on December 12, 2022, at 9:00am, I will appear before the Honorable Jacqueline P. Cox, or any judge sitting in that judge's place, **either** in courtroom 680 of the Everett McKinley Dirksen United States Courthouse, 219 S. Dearborn Street, Chicago, IL 60604, **or** electronically as described below, and present the motion of Debtor to Modify Plan, a copy of which is attached.

All parties in interest, including the movant, may appear for the presentment of the motion either in person or electronically using Zoom for Government.

You may appear electronically by video or by telephone.

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and passcode.

Meeting ID and passcode. The meeting ID for this hearing is 161 273 2896, and the passcode is 778135. The meeting ID and passcode can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without calling it.

PROOF OF SERVICE

I, the undersigned, certify that I caused this Notice and a copy of the attached document(s) to be served upon the entities named above by depositing the same in the U.S. Postal Service's mail box at 8707 Skokie Blvd Suite 305, Skokie, IL 60077 on November 21, 2022, except that the Trustee and any other party indicated in the Notice of Filing were served electronically by the court on such date.

/s/ David Freydin
David Freydin, Esq
Law Offices of David Freydin
8707 Skokie Blvd, Suite 312
Skokie, IL 60077
Phone: 847.972.6157

Label Matrix for local noticing
0752-1

Case 19-27035
Northern District of Illinois
Eastern Division
Thu Oct 3 10:48:29 CDT 2019

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Capital One Auto Finance
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Chase Card Services
Attn: Bankruptcy
Po Box 15298
Wilmington, DE 19850-5298

Circuit Court of Cook County
Richard J. Daley Center
50 W. Washington
Chicago, IL 60602-1367

Cook County Treasurer
118 N Clark St., #112
Chicago, IL 60602-1590

Kohls/Capital One
Attn: Credit Administrator
Po Box 3043
Milwaukee, WI 53201-3043

Ollo Card Services
Attn: Bankruptcy
Po Box 9222
Old Bethpage, NY 11804-9222

Synch/ Care Credit
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896-5060

Synchrony Bank/ JC Penneys
Attn: Bankruptcy
Po Box 956060
Orlando, FL 32896-0001

Capital One Auto Finance, a division of Capital One
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Bernadine Hill
17713 Commercial, Unit 1N
Lansing, IL 60438-4825

Capital One Auto Finance, a division of
AIS Portfolio Services, LP
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

Chase Mortgage
Attn: Bankruptcy Dept.
Mail Code LA4 5555 700 Kansas Ln
Monroe, LA 71203

Citibank/The Home Depot
Attn: Recovery/Centralized Bankruptcy
Po Box 790034
St Louis, MO 63179-0034

Discover Bank
Discover Products Inc
PO Box 3025
New Albany, OH 43054-3025

Lieberman Management Services
25 Northwest Point
Suite 330
Elk Grove Village, IL 60007-1033

Select Portfolio Servicing
PO Box 65250
Salt Lake City, UT 84165-0250

Synchrony Bank
Attn: Bankruptcy Dept
Po Box 965060
Orlando, FL 32896-5060

Synchrony Bank/Old Navy
Attn: Bankruptcy Dept
Po Box 965060
Orlando, FL 32896-5060

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Capital One
Attn: Bankruptcy
Po Box 30285
Salt Lake City, UT 84130-0285

Capital One/Carson
Attn: Bankruptcy Dept
Po Box 30285
Salt Lake City, UT 84130-0285

Chase Mortgage
Chase Records Center/Attn: Correspondence
Mail Code LA4 5555 700 Kansas Ln
Monroe, LA 71203

Comenity Bank/Carsons
Attn: Bankruptcy
Po Box 182125
Columbus, OH 43218-2125

(p)DISCOVER FINANCIAL SERVICES LLC
PO BOX 3025
NEW ALBANY OH 43054-3025

Michele Founner
233 E. 13th Street, Unit 1608
Chicago, IL 60605-3253

Select Portfolio Servicing, Inc
Attn: Bankruptcy
Po Box 65250
Salt Lake City, UT 84165-0250

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

Synchrony Bank/Pearl Vision Inc-
Attn: Bankruptcy
Po Box 965060
Orlando, FL 32896-5060

Telecom Self-reported
Po Box 4500
Allen, TX 75013-1311

Teresa Jennings
17713 Commercial, Unit 2S
Lansing, IL 60438-4825

Torrence and Tasha Garner
657 Escanaba
Calumet City, IL 60409-3925

USDOE/GLELSI
Attn: Bankruptcy
Po Box 7860
Madison, WI 53707-7860

Unique Johnson
17713 Commercial, Unit 1S
Lansing, IL 60438-4825

Utility Self-reported
Po Box 4500
Allen, TX 75013-1311

Wells Fargo Bank NA
Attn: Bankruptcy
1 Home Campus Mac X2303-01a
Des Moines, IA 50328-0001

Wells Fargo Home Mor
Attn: Bankruptcy
PO Box 10335
Des Moines, IA 50306-0335

David Freydin
Law Offices of David Freydin Ltd
8707 Skokie Blvd
Suite 305
Skokie, IL 60077-2281

Melanie A. Sharpe
16721 Luella Ave
South Holland, IL 60473-2620

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

Tom Vaughn
55 E. Monroe Street, Suite 3850
Chicago, IL 60603-5764

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Discover Financial
Attn: Bankruptcy Department
Po Box 15316
Wilmington, DE 19850

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Capital One Auto Finance, a division of Ca
4515 N Santa Fe Ave. Dept. APS
Oklahoma City, OK 73118-7901

End of Label Matrix
Mailable recipients 41
Bypassed recipients 1
Total 42

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

In the Matter of:

Melanie A. Sharpe

Debtor(s)

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Case No. 19-27035

Chapter 13

Judge Jacqueline P. Cox

DEBTOR'S MOTION TO MODIFY PLAN

NOW COMES THE DEBTOR by and through her attorney, David Freydin, and requests that this Honorable Court modify the Chapter 13 Plan under Section 1329 for the reasons below, and in support thereof, states as follows:

1. That the Debtor filed a Chapter 13 bankruptcy petition in the Northern District of Illinois, Eastern Division as case number 19-27035 on September 24, 2019
2. That this Honorable Court confirmed the Debtor's Chapter 13 Plan on December 9, 2019, with secured creditors to be paid 100.00% and general unsecured creditors to be paid 100.00%.
3. That the Debtor has not converted the instant Chapter 13 case to a Chapter 7 case.
4. That the Debtor's confirmed plan requires her to pay \$3425.00 per month for 60 months.
5. That Debtor's Chapter 13 plan payments are currently based, in part, on paying \$130,542.09 in mortgage arrears. Please see Claim 10-1 attached hereto as Exhibit A.
6. That Debtor recently completed a loan modification, and her mortgage is now current.
7. That Debtor requests that this honorable court lower her monthly Trustee payment to \$2,145.00 per month effective November 2022 for the remainder of the plan.

8. That the Debtor also asks this Honorable Court to defer the plan default through November 2022 so that she may continue to pay the secured and general unsecured creditors 100% of allowed claims.
9. That by deferring the current default and lowering the monthly Trustee payments to \$2,145.00, the creditors that have filed claims in this case will receive more than they would if the case were dismissed, or if the Debtor was forced to convert case to one arising under Chapter 7 of the Bankruptcy Code.
10. That the Debtor filed the instant case in good faith and intend to complete the Plan of Reorganization.

WHEREFORE DEBTOR, THE MOVANT, PRAYS that this Honorable Court enter an order modifying the Chapter 13 plan to:

- A. Lower Debtor's monthly Trustee payment to \$2,145.00 per month effective December 2022;
- B. Defer the plan default through November 2022;
- C. Remove the Cenlar arrears from Section 3.1 of the Chapter 13 Plan;
- D. For such other and further relief this Court deems just and proper.

/s/ David Freydin
David Freydin
Law Offices of David Freydin, PC
8707 Skokie Blvd., Suite 312
Skokie, IL 60077
Phone: 847.972.6157